

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

DENISE JACKSON,

Plaintiff,

-against-

WELLS FARGO HOME MORTGAGE,

Defendant.

Case No.: 1:15-cv-05062-PKC-ST

**NOTICE OF MOTION TO DISMISS  
AMENDED COMPLAINT**

**PLEASE TAKE NOTICE** that upon the accompanying Declaration of Robin L. Muir in Support of Defendant Wells Fargo Bank, N.A.'s Motion to Dismiss Amended Complaint, dated August 7, 2017, and the exhibits thereto; the accompanying Memorandum of Law in Support of Defendant Wells Fargo Bank, N.A.'s Motion to Dismiss Amended Complaint, dated August 7, 2017; and all prior pleadings and papers filed in this action, defendant Wells Fargo Bank, N.A., sued herein as Wells Fargo Home Mortgage ("Wells Fargo"), by its undersigned counsel, will move this Court, before Judge Pamela K. Chen, at the United States District Court for the Eastern District of New York, the courthouse thereof, located at 225 Cadman Plaza East, Brooklyn, New York 11201, at a date and time to be set by the Court, for an order, pursuant to Fed. R. Civ. P. 12(b)(6), dismissing the claims asserted against Wells Fargo by plaintiff *pro se* Denise Jackson ("Plaintiff") in the Amended Complaint filed on May 16, 2017, as supplemented by the Addendum filed on June 6, 2017, with prejudice, and granting such other and further relief to Wells Fargo as the Court deems just and proper; and

**PLEASE TAKE FURTHER NOTICE** that pursuant to the briefing schedule set by the Court on July 6, 2017, Plaintiff's opposition shall be served by September 8, 2017, Wells Fargo's reply shall be served by September 15, 2017, and the fully briefed motion shall be filed by Wells Fargo via ECF by September 15, 2017.

New York, New York  
August 7, 2017

HOGAN LOVELLS US LLP

By: /s/ Robin L. Muir  
Lisa J. Fried  
Robin L. Muir  
875 Third Avenue  
New York, New York 10022  
Tel: (212) 918-3000  
Fax: (212) 918-3100  
lisa.fried@hoganlovells.com  
robin.muir@hoganlovells.com  
*Counsel for Defendant Wells Fargo Bank,  
N.A. s/h/a Wells Fargo Home Mortgage*

To: Denise Jackson  
215 Maple Street  
Brooklyn, New York 11225  
*Plaintiff Pro Se*